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EVALUATION OF LISA BARBOUNIS

Date of evaluation: August 31, 2020—no show
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Place of evaluation: Zoom

I performed this evaluation at the request of counsel for defendants and was retained for this service. Lisa Barbounis was informed of this relationship. Further, she was informed that this evaluation was non-confidential and did not constitute medical treatment or a treating relationship with the examiner. The assessment took place over the course of approximately six hours.

HISTORY, AS RECOUNTED BY LISA BARBOUNIS

Lisa Barbounis, nee Reynolds, is a 38-year-old married female, born October 7, 1981 and raised in southern New Jersey. Ms. Barbounis is the older of two siblings, with a 35-year old brother. Her parents are married; Mrs. Reynolds is 62 years old and Mr. Reynolds is 66 years old. Mr. Reynolds works as a specialized infusion nurse. Ms. Barbounis said of her father, “he grew up hard” and described him as “more like a follower than a leader.” She commented that her father was “a really good dad,” who is “probably one of the smartest people I know.” Ms. Barbounis remarked that her father was “always there for [her]” and understood her better than did her mother. Ms. Barbounis cried as she described her mother, noting that Mrs. Reynolds’ primary occupation is a nurse anesthetist. She also sells furniture and is involved in interior design. When asked why she was tearful, Ms. Barbounis replied, “I’m emotional sometimes. My whole life has been so crazy. It’s been super stressful for me.” Ms. Barbounis continued to discuss her mother, noting that Mrs. Reynolds was “the alpha” in the household. She made more money than did her husband and was the “strong one,” who set the tone for the family. Ms. Barbounis recalled that she often felt negatively judged by her mother, noting that if she was not “perfect,” then “it wasn’t good enough.” According to Ms. Barbounis, she had undiagnosed ADHD in her youth and found organization difficult. She recalled that she was frequently taken to task because her room at home and desk at school were messy. Ms. Barbounis remarked that her mother called her lazy and spoiled as a result of her inability to keep order with her belongings. As a result, Ms. Barbounis “never felt good enough for [her] parents or at least especially for [her] mom.”

As a result of feeling like she consistently failed to meet her mother’s expectations, Ms. Barbounis developed “bad self-esteem,” remarking that she felt frustrated because she could not perform tasks such as keeping herself ordered. She recalled that when she fell into disfavor with her mother, whom she described as “tough as nails,” Mrs. Reynolds would refuse to speak to her for days, noting that this happened frequently during her early childhood. In addition, Ms. Barbounis was punished by being compelled to sit in the bathroom for a half hour when she did not fulfill her

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duties at home. Ms. Barbounis denied that she was ever physically disciplined. She further denied that either parent had problems with drugs or alcohol.

Ms. Barbounis attended St. Jude's, a Catholic elementary school from kindergarten through eighth grade. She recalled that she was frequently in trouble at home because she "didn't have discipline" at school and teachers reported infractions to Ms. Barbounis' parents. As a result, Ms. Barbounis "learned early to toughen up and to be strong." She commented that from a young age, she developed "a really tough outer shell" and an attitude of "nobody's going to hurt me." Ms. Barbounis said that this persona developed in response to feeling like she was "the bad seed" in her family, remarking that her brother "was like the chosen one."

Ms. Barbounis said that she had friends in school, but was inhibited by low self-esteem, recalling, "I always had this insecure feeling." She had a best friend, with whom she attended Bible camps in the summer, but this girl moved away from the area when Ms. Barbounis was in sixth grade. Despite her lack of organization, Ms. Barbounis did well academically. Her chief extracurricular activity was horseback riding, which she began in elementary school. Ms. Barbounis was a good equestrian, noting that riding came easily to her. She reflected, "it was the only time it was just me and my thoughts."

For high school, Ms. Barbounis initially attended Our Lady of Mercy, an all-girls school with approximately 40 students per class. She said that she was "at best, a C student." Ms. Barbounis recalled that she was "tall and awkward," indicating that she was five feet 11 inches tall and very thin. She said that the school was "very cliquey," remarking that she did not fit in with the "really smart girls." Ms. Barbounis also did not feel connected to the "nerdy girls," commenting "they weren't into clothes and boys." She "wanted to be liked," and found a place with "the tough girls." Ms. Barbounis said that she "fell into the peer pressure trap," and reported that she began smoking cigarettes. Ms. Barbounis denied using drugs and said that she did not have serious behavioral problems at school. However, at some point during her sophomore year, she and another student had a physical altercation on the school bus, and both were "asked to leave" the school.

After leaving St. Jude's, Ms. Barbounis attended the local public school, Washington Township High School. She recalled feeling self-conscious about her wardrobe because her mother would not buy her clothes because she did not feel that her daughter took proper care of them. Ms. Barbounis remarked that she had worked since age 12, at restaurants and babysitting. With money earned from her employment, Ms. Barbounis bought herself clothing and paid for things she wanted. Her father thought that her group of friends reflected poorly on her and Mr. Reynolds told his daughter to "get some self-esteem." Ms. Barbounis did poorly in school, reporting that she "stopped trying" and graduated with a G.P.A. of 1.86. During summers, Ms. Barbounis held a variety of jobs, such as at a restaurant, for a tree service, and as a bartender.

Ms. Barbounis graduated from high school in 1999. She began taking classes at Gloucester County Community College. Ms. Barbounis said that she did not complete a full semester and, because she simply stopped going to classes rather than withdrawing from school, she received failing grades. After dropping out of college, Ms. Barbounis moved in with a friend and supported herself by working two jobs, opening mail for an insurance company and bartending at night. She had "a couple" of serious boyfriends, one of whom, Colin she described as "the perfect boyfriend" and to

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whom she was briefly engaged. However, when Ms. Barbounis discovered that Colin had “a drug problem,” she ended their relationship and moved into her own apartment.

Ms. Barbounis next dated Bobby. The relationship progressed and the couple lived with Bobby’s parents in an effort to save money to build a house near Wildwood, New Jersey. She continued to bartend and obtained her real estate license while Bobby “was trying to be a rock star.” Ms. Barbounis commented that she had “trust issues” and a fear of abandonment. She believed Bobby was being unfaithful. Their relationship was unsteady and ended after four years. Ms. Barbounis then moved to Philadelphia and began working at Prudential, Fox and Roach where she met her husband, another real estate agent at the company. The couple dated for six years and married in 2012.

While at Prudential, a lawyer encouraged Ms. Barbounis to study law. In 2006, she began taking paralegal classes at Community College of Philadelphia. She completed two semesters and remarked that she “never worked so hard in [her] life.” Ms. Barbounis stated that she was “barely literate” after high school and struggled with comprehension. However, Mr. Reynolds read academic passages to her and helped her through her classes. Ms. Barbounis’ grades were “outstanding for Community College.” Ms. Barbounis’ professors thought that she was a good student and wrote her letters of recommendation so that she could matriculate in a bachelor’s program. She was accepted to both the University of Pennsylvania [Penn] and Drexel. Ms. Barbounis considered her time at Penn, which she entered in 2008 and recalled:

I have never been so self-actualized... I worked really hard and I got good grades... I always say I know I have two kids and a husband, and the proudest moment of my life was when I graduated from Penn... anybody could have a baby... Like, I accomplished this...

During her tenure at Penn, Ms. Barbounis was diagnosed with ADHD. Asked about the circumstances that led to this diagnosis, Ms. Barbounis related that she told a professor she was struggling with comprehension. He advised her to go for an evaluation and, accordingly, Ms. Barbounis was seen at Penn Behavioral Health. She underwent educational testing, was diagnosed with ADHD, was prescribed Adderall and enrolled in cognitive behavioral therapy, which she found “really, really helpful.” After this, Ms. Barbounis’ grades skyrocketed; she started getting “straight As.” Ms. Barbounis described her life as “A+” at this time. She recounted:

I learned about mindfulness and my brain works quickly... I learned tricks and tools to slow my brain down... My mom was always black and white... My relationships improved... I did Weingarten for study habits.

Ms. Barbounis made friends quickly at Penn and was surprised that peers sought her out for academic help. She reflected:

I’m coming from Community College and they weren’t, and it was – like - an eye opening experience to me. They would come to me and say, “I need help with my French homework” or, you know, “Can you help with this decision tree” or, you know, “What do you think about Hobbes’s theory?” And I’m - like - Oh my God they actually think I’m smart. It was weird for me but it felt really, really good... Even Vasili would tell you – like

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- he saw a change in my self-esteem, how I carry myself. It was just... the best thing that ever happened to me. Hands down.

Ms. Barbounis took “three full years of classes” and graduated from the University of Pennsylvania in 2012 with a degree in Philosophy, Politics and Economics. She said that through her studies, she cultivated a passion for politics and applied to legislative jobs after she completed her degree. Ms. Barbounis supported herself by working the front desk at a Marriott Hotel and acting as a bartender at night. She ultimately landed an internship “on the hill,” in Congressman Costello’s office. Ms. Barbounis moved to Washington, D.C, and completed her internship with the financial support of her husband. Her internship turned into paid employment, and Ms. Barbounis continued with this office for five years describing her experience with the congressman as, “the best time.”

In 2013, Ms. Barbounis learned that she was pregnant. She recalled:

So Vasili’s like, “Alright, well, you can’t live in D.C. while I live in Philly and you know, we can’t have a baby like this you gotta come home.” And so, the congressman was nice enough to give me a job in his district office. So, I did casework and I did some VA legislation. That way I got to keep the legislation piece. But I was wonderful. I have never been better at a job in my entire life...

I started working in Westchester at the Westchester district office and then I would still go down to D.C... I felt good about myself. I was doing great... I had my daughter and I feel like I was a great mother... And my mom would always say like, “You’re so much more patient than I am.” And I was determined to – like - be super healthy. I made all the organic baby food from scratch... I breastfed both my kids while working, for 12 months each... We moved into a house in East Falls – a big stone colonial and life was good.

Ms. Barbounis gave birth to her daughter, Olivia and had her second child, George, in 2016.

Ms. Barbounis described herself as a “workhorse,” noting that she worked long hours, traveled in the service of her job, and took little time for herself beyond horseback riding once a week. She felt very self-confident in her work abilities, loved her work environment and thrived on the praise she received for her work product. Ms. Barbounis commented:

I mean still to this day people are emailing me from the same address. “Please help me. Please help my friends - like - Please help us, please help us.” I have boxes of thank you cards and so it was again that – like - affirmation that I was good and worthy.

In 2017, Congressman Costello chose not to run for re-election and Ms. Barbounis began to apply for jobs. When asked about her previously stated desire to go to law school, Ms. Barbounis commented that she abandoned this plan because she learned that she did not need to have a law degree to write policy.

Although Ms. Barbounis looked for a job in Philadelphia, she found it difficult, commenting, “I’m a conservative and I’m in politics and this is Philadelphia and there’s not really many jobs for me here.” In her search, she came across a Behavioral Economics and Public Policy Master’s program

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that was run by one of her former professors. Ms. Barbounis reached out to the professor and was told that she would be accepted to the program even as she was late to apply. Ms. Barbounis related that the professor told her, “We remember you. We love you. You’re smart. You’re capable.” She enrolled as a part-time student and continued to work for Congressman Costello.

TENURE WITH MIDDLE EAST FORUM, AS RECOUNTED BY LISA BARBOUNIS

As a result of an application through LinkedIn, Ms. Barbounis received a phone call regarding a position at Middle East Forum (MEF). She recalled:

It was conservative and it was – like - it was hot topic at the moment... the Middle East and Islam and they seem to be conservative and I agreed with a lot of the things that they were saying... I didn't understand the nuances until I actually worked there... I was – like - this looks good and I applied for apply for a programming something. I forget what it was; it was - like - development oriented. But then when they called me, with Gregg Roman and Matt Bennett on the phone, they were - like - listen we also have an assistant position which is what we think you'd be really good at because it would have to do with helping write policy...

I was - like - “Well, that would be like a step down for me. I'm basically the Deputy District Director of this office and I've been working in Congress for five years and if my boss didn't leave, I was next to be District Director.” ... They were - like, “That's okay. We get what you want to do and we're growing and eventually we can - like - make you Chief of Staff ... We're really flexible here - you have kids...

Ms. Barbounis said that the MEF office in which she would work was approximately five minutes from her house. Her husband was enthusiastic about the position because he believed that she would be able to work from home some days and because she would be relieved of the 45-minute commute she had between Philadelphia and West Chester.

Ms. Barbounis went for an interview, although she was certain she already had the job based on her phone conversation with Mr. Roman and Mr. Bennett. Ms. Barbounis said that on the day of the interview, she was met outside by Mr. Bennett who told her it was “a done deal.” She continued into the office, where she met with Mr. Roman who was “so intense.” Ms. Barbounis continued:

I always say that from bartending, I have - like - a sixth sense of people... I can read people in the first 20 minutes and get a good feel for them. I walked in this place and this place looked like crap. I'm – like - thinking how is this a reputable organization if the office looks like this?

Gregg was so intense, and he was - like - crazy honestly. Right away, from the gate, in my interview. And he grilled me. I was in there for like two hours and he was just – like - asking me questions about, like, escape routes and – like – “If anybody ever comes up here, what's the escape?” And I'm thinking of - like - trying to think of the layout of the thing and where we would go and – like - crazy questions.

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And he was like, "You know... I'm probably not supposed to say this, but like, I need a work wife." And I was - like - alright. I mean people use that word thrown around. Like, I always teased Catherine at my job - Catherine was like the congressman's scheduler. Her and I were - like - super tight. She would always say that we were work wives. Like, "Oh, that's my work wife." Just people throwing that [term] around... but something about me something about Gregg did not rub me the right way. Like, it was something was off immediately and like the fact that he was like saying that like on the first five minutes or whatever it was weird to me. I went home and I said, "So, I don't know about this job, like something is off."

Nonetheless, Ms. Barbounis was offered, and accepted, the job at the Middle East Forum. Initially, the position was better than she expected. Ms. Barbounis was given the type of work she enjoyed but recalled that Mr. Roman was "intense," and "bark[ed] orders" at people on conference calls. She stated:

He would - like - talk crap behind their back and - like - manipulate them and say certain things then and then talk shit behind their back and you would know he was doing about you. He's doing it about everybody. That's kind of like how he ran it. Like pitting people against each other. Kind of like what they say Trump does... Like pitting people against each other like to see who wins and comes up with the best ideas. Like it's some game or something. But anyway, he would be worse with the women.

Asked to provide examples of the manner by which Mr. Roman was "worse with women," Ms. Barbounis replied:

Like Samantha Mindelis (ph), she would call me up and be - like - "They really treat me like shit 'cause Sam gets paid - like - \$90,000 year and I get paid 40 grand a year." and I'm - like - "Well, they said your salary was bloated," and she was - like - "What!? I do all the work!"

Ms. Barbounis asserted, "There's books about - like - how they treat the women in the office. You can read it in black and white." She continued to describe her sense of how the women in the office were treated more poorly by Mr. Roman than were the men, noting:

This girl Aman Patel - that's not her real name - she was working - because she was a Muslim lesbian woman, she worked under a pseudonym because she was already getting like death threats and stuff like that under her real name online. She would get [threats] - like - a lot. So, they found out that she was working for a conservative organization that was fighting Islamism, which is different than Islam. They would lose their minds and really come after her. We had like Isis threats against the president, Daniel Pipes, and stuff like that, so we were under like surveillance and security all the time... Gregg had cameras everywhere in the office and - like - watching everything everybody did. It was under the premise that it was for security purposes because Isis threatened our boss at one point... I would see them give work to Aman...

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Ms. Barbounis provided an expansive narrative that was difficult to follow about the work requested of Aman. Her central point was that Aman was the Communications Director and she was being asked to get information about the MEF placed in “like the most liberal outlets.” Ms. Barbounis commented:

It doesn't matter how good of a relationship you have with any editor they're not going to put what they considered far right-wing stuff in The Washington Post.

When Ms. Barbounis was questioned about how these tasks were related to gender issues, she replied:

So, Gregg had confided in me that the reason that we're given Aman [impossible tasks] is because we can't fire her. She's a walking lawsuit. She's a woman she's a lesbian... So, like, “We just want to get rid of her, right?” and I'm like, “Well that's really messed up but alright,” you know what I mean... There were like lots of little things like that.

Ms. Barbounis continued:

I told you that I'm just hypersensitive about justice but – like - I'm not like going to lay down, by any stretch of the imagination. I'm not someone who takes any crap. I get that from my mom, right. Like, I don't tolerate it... I don't like the [#]metoo movement. I don't like any of that. I'm – like - a woman is just as equal as a man and she should be able to see her own self. I don't want a chaperone when I'm sitting with the congressman, right. Like I want to be a strong woman. You should have seen me during the Kavanaugh thing. Anyway, what was my point in saying this? So, just so you know, Aman gets fired...

Immediately after the discussion about Aman, Ms. Barbounis related a complex story about an 85-year-old man named Arthur who donated \$300,000 to Middle East Forum to fund an international conference on ethics and philosophy. Months went by and no work was completed because Mr. Roman “didn't like” Arthur. Ultimately, Arthur requested his money back. According to Ms. Barbounis, Mr. Roman devised a plan to keep \$50,000 of Arthur's money by creating a billing ledger of time spent on the project. Ms. Barbounis told Middle East Forum's in-house counsel that she would not be “used to steal this man's money because if he ever sued you for it, I'm telling the truth in court.” Ms. Barbounis said that this episode served as an illustration of “just how morally bankrupt they are.”

Ms. Barbounis continued her work for the MEF. She described Mr. Roman as scatterbrained and “Not a good human, you can tell.” Ms. Barbounis remarked that she would come home and “de-stress” after her workday. However, Ms. Barbounis remained with the MEF, hoping to expand her role. She said that Mr. Roman told her that they were going to “grow” together, and she said that he assured her that she was going to be his Chief of Staff.

Ms. Barbounis discussed the AIPAC conference in D.C. She said that the MEF hosted a dinner and remarked that her role was to entertain donors. She described the evening:

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I was – like - really interested in this conversation with one of our fellows. She was the old Breitbart editor for London... So, after it was done, everybody was – like - it was a great night. It was very successful; people were very happy with all of us in the event... I would talk policy with all the people... We all got up and had these great conversations...

Afterwards, we all went out - like - drinking and other like things. We had – like - a good amount, nothing like crazy at all. We're leaving this one bar and it's almost – like - 2 in the morning. Trisha, me and Marnie shared - like - a hotel room. That's where we were getting ready and whatever and Gregg and Matt got this- like - giant sweet Airbnb...

I was like hanging out with Rahim the whole night but not in a sexual way. I'm like 5' 11" and Rahim is like 5'2" and he has these little nerdy glasses. But he was very smart, and I was – like - really enjoying our conversation. So, him and I were - like - hanging out and I wasn't really drinking at this point... So him and I were talking, talking, talking, so we're about to leave and Gregg's like, "You're coming with us." and I was like, "No, I want to go back to the hotel, or - like - finish my conversation with him. He's like, "Get in the seat." because it was - like - he got a suburban for all of us... so he – like - made us get in this car.

Mr. Roman took them back to his Airbnb along with three 25-year-old individuals from the Pinsker Fellows that Mr. Roman invited. In addition, Matt Bennett, the Development Director at MEF, Tricia, and Marnie, the HR Manager at the MEF were at the Airbnb. Ms. Barbounis noted that "no one trusted" Marnie. While at the Airbnb, Ms. Barbounis took a seat on the couch next to Mr. Roman. She reported that Ms. McNulty was on Mr. Roman's other side. Mr. Roman opened a box containing marijuana. He rose and left the room, presumably in order to smoke. Ms. Barbounis remarked that this occurred at 2AM, at which time no one was drinking. When Mr. Roman left, "Rahim just shows up." Ms. Barbounis recalled that someone in the crowd said, "Somebody can go suck a dick." To which she responded, "Unlucky for you guys, you'll never know." She continued:

We're all sitting there and then all of a sudden Gregg is - like - sitting back on the couch... It was like Rahim, me, Gregg, Tricia...Across from us were the three Pinsker guys...

Mr. Roman told the Pinsker guests that it was late, and that they needed to leave. Ms. Barbounis stated that "it was really awkward the way he did it." Mr. Roman shook the hands of the departing guests then grabbed Ms. Barbounis around the shoulder and "scooped" Ms. McNulty around her buttocks and whispered, "Something like there's no need to have any other men here but me, right?" Ms. Barbounis was asked to clarify the placement of the central actors and she said that Mr. Roman's hand was "like under [Trisha's] butt," remarking that Mr. Roman was "A 6'5" beast of a man. My husband calls him Shrek."

After this, Ms. Meyers ordered pizza and the group all went to the kitchen to eat. Ms. Barbounis said that Ms. Meyers took photographs of her out on the balcony "cause, it has a beautiful view of the city and the Washington monument and stuff like that." Ms. Barbounis then fell asleep on the couch, and someone placed a blanket over her. She later learned that Ms. McNulty and Ms. Meyers did "rock-paper-scissors" to see who would get the extra bedroom in the Airbnb. Ms. McNulty

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won the contest and Ms. Meyers slept on the couch near Ms. Barbounis. Ms. Barbounis stated, "The whole point was we weren't allowed even to go back to our own hotel."

Ms. Barbounis was asked to explain the statement that she and the other women were not permitted to return to their hotel. She acknowledged that she never asked to leave the Airbnb but simply fell asleep. She continued:

At the time, to be fair, I didn't feel at the time -- I didn't feel like anybody was gonna molest me in my sleep, either. At that time, like, I'm going to be completely honest, I feel like I just like -- Gregg's being weird and inappropriate but it wasn't like it bothered me. Like I said, I've had men hit on me my whole entire life. I've always been, you know, I'm attractive. You don't see me now dressed up but - like - I'm a pretty good looking girl and I'm 5'11" and I'm always wearing high heels and have my makeup done because my mom would never let me leave the house with - like - sweatpants on or whatever. You know what I mean? So, I've gotten hit on and I know how to - in my head - handle that and I'm tough. Like, my thing was - like - if I'm going to play in this big boy arena, I need to put my big girl pants on and not care who hits on me. You know what I'm saying?

Now I've never been put in a position where a boss hit on me ever before. But, that's how I felt. But I also didn't feel like he was going to physically take advantage me. He's going to point out I didn't feel like that, but I did feel like he did make me feel inappropriate in that moment... I didn't like how he grabbed me. I didn't like how he made me feel and that's like that's how it was in my head.

So, the reason that the blow job comment matters is because the next day - actually the next work day, we all were back in the office in the mansion. We were talking and Gregg woke up the next morning and was like, "Did my assistant say how great she was at giving blow jobs?"... That's not what I said but okay... I made that flip comment and I was like, "I mean like why is he even telling me this right now?" I'm like, "Why are you guys talking about that anyway?" Like it was supposed to be me, and I had like a smart alecky retort to somebody saying go suck a dick. I was going to... whatever. So - like -that happened.

So, then a couple weeks later, Gregg wanted to go to Israel. He said he had this special project he was working on and it was supposed to be secretive, with - like - Saudi Arabia and he needed help and blah blah blah. So, apparently, he asked Marnie to go first. But she didn't think it was appropriate for her, as a single woman, to go away with him alone because he got an Airbnb and she thought she should have her own hotel room.

Mr. Roman then asked Ms. Barbounis to go. She described herself as very happy; she had very limited travel experience and had only been overseas twice before in her life. Ms. Barbounis understood that she would be staying in the same Airbnb with Mr. Roman, but she was promised her own bedroom and her own bathroom. She continued:

I was - like - thanking him for the opportunity. I was excited that I'm going to Israel. I had never been there. So, we get there and the first day, we go to our place and it's nothing like what he said. There's either a small bedroom next to his one bathroom off the kitchen that

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was like a shower and one toilet and then there's a bedroom that's like all glass walls with just like a curtain and no actual lock on the door but it was like the furthest away from his room. But it's like off the living room so [Mr. Roman is] like, "Oh, so sorry this place said it had two bathrooms and it said that it had it was more spacious than this." ... I don't care, whatever, I'll take the furthest bedroom away 'cause I wanted privacy. I wasn't at the time thinking that a lock on my door was important, not even a little bit. And so I went back and brought my stuff there.

And so we did good. We - like - went to meetings and him and I were - like - getting along...

One evening during this trip, Mr. Roman invited Ms. Barbounis out to the balcony where he was smoking a cigarette. He pointed out the sights of Tel Aviv. Ms. Barbounis was sitting on the edge of a couch and Mr. Roman lay down on the couch. As they talked, Mr. Roman put his foot under Ms. Barbounis' bottom. She recalled:

I was like, "Gregg, why do you always gotta be weird?" And, [she told him], "Like stop." And he's like, "Oh, you know you're my work wife. You know, it's me, you, and the universe. You're going to be my right hand man. You're going to be my Huma Abedin." and I'm like, "Alright but - like - don't touch my bottom. Thanks." ... I wasn't flipping about it and I'm like, "Alright, all the signs are indicating that freaking Gregg thinks I'm attractive, but I'm used to men thinking I'm attractive. It's still awkward and uncomfortable.

Where it gets really awful was another day or two go by and Gregg says he has these meetings... He was bringing me to everything but now he has these meetings? And I was like, "Well, I have to stay and finish this PowerPoint presentation anyway so I'm going to stay in and work."

So, I stayed in and worked, and he comes back from one of the appointments and he's drunk. When I say he's drunk, he's drunk, right? And he's talking - and this is how the blow jobs come into it - he said that he fucked our intern, Leah. Those were his words. Leah was our French intern who was like 20 years old and he was like, "I fucked Leah and Leah she had this rockin' body and she was a dancer." I said, "Gregg, you're married, right? Like what are you doing?" I mean I was like, "Plus if anybody learns that you're having sex with interns - like - you can lose everything. What do you think you're doing?" and he goes, "You know, it's so stressful. Don't I just deserve a release? You know just like a good blow job every once in a while. I deserve a release Lisa. I just need one, right?" And I'm like, "Right. I mean like you're really freaking inappropriate right now." And so - like - I was like text messaging people.

So he was like, "Well I've gotta meet another person. I'm going back out." And I was - like, "Alright, fine." So I call my husband and I tell him that Gregg's being really freaking weird, blah blah blah.

Ms. Barbounis digressed at this juncture and related that Mr. Roman had not wanted her to tell anyone, including the president of the MEF, that she was accompanying him on this trip. When it

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was pointed out that Ms. Meyers was aware that Ms. Barbounis was going, Ms. Barbounis replied that Mr. Roman had not wanted his wife to be aware of her presence. She said that she had posted a picture on Facebook of herself in Tel Aviv and E.J. Kimball called her and said, "Oh, you're here!" to which Ms. Barbounis replied, "Oh my God, you're not supposed to know that I'm here. Please don't say anything."

Mr. Roman returned from his second meeting that evening "even more drunk" and stated that he tried to meet up with a different woman. Ms. Barbounis noted that Mr. Roman's first outing had been to visit a woman named Celia. The second meeting was with Leah, who "turned him down." Ms. Barbounis asked Mr. Roman, "How did you even hook up with Leah?" She recounted:

So, he's telling me that that [referring to sexual activity with Leah] happened before and that he tried to meet up with her again and she denied him... So, the ex-girlfriend [Celia] and Leah had both turned him down now, two times that night. And so, he starts – like – going on his Facebook, on – like – the TV. Like he pulled up his Facebook on the TV so it's showing me all of his ex-girlfriends. He was like, "Look at this one. Look at that one" and "This is me and my young DJ days." Like, "You know, my wife isn't that hot, but I'm married" or "Lisa, she's Israeli and we have – like – values, but – like – I deserve like a hot wife and I deserve a good blow job." He was like, "I deserve it. I deserve a blow job" and I was getting – like – so uncomfortable. He was making me feel like he was requesting a blow job from me.

The reason that I told you about that blow job comment that I made before comes into play. Because all I could think about in my head was how I made that comment and how Matt brought it up. Gregg was like, "Did my assistant just said she gives good blowjobs?" Now he got turned down by these two women. I told you that I'm tough, right? Like I'm a tough chick. I've never been scared by anybody in my life. But I started texting Trisha and – like – my best friend. "Gregg's being so weird." She's like, "AIPAC couch weird?" I was like, "No, like I'm going to sleep with a knife under my pillow weird. Because I'm afraid that he's going to come in my room drunk and like attack me." I mean my husband's Face Timing me and I – like – texted my old work wife Catherine. I was like, "My boss is being – like – completely crazy and weird right now."

And so, at first when we were there [in Israel], he wouldn't let me out of his sight. Like we went to the Knesset and it was near the old city, right. And I have never been to the old city, right. And so I was like, "I'll go by myself." And he was like, "I'm not letting you go anywhere by yourself. It's dangerous; you're not allowed to go anywhere in Jerusalem by yourself without me."

Ms. Barbounis said that Mr. Roman would not permit her to sightsee on her own, telling her that she would have other opportunities. She then continued:

I went in my room and – like – put a thing up against [the door]. I was – like – legit scared. I got a knife in the kitchen and put it under my pillow, just in case. So, after all that happened, when I go to bed and wake up the next morning, he said he has people **coming** over to the house. It was – like – almost our last day there for meetings. And he was – like

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- you know you don't have to be there for these, you can go out. Why don't you go walk around Tel Aviv and - like - be in the marketplace or do whatever. So, like all of a sudden - like - after he was that crazy and creepy with me. And he's - like - he kind of half apologized to me in the morning - like, "So I was a little drunk last night," like that kind of thing. And now, all of a sudden, I'm not in these meetings with him and he's immediately being different than he was. Which is great, because I didn't want to be around him.

So, I went to the market and I wandered around for hours. I - like - walked all the way down to the water. I walked to the fashion district, drank coffee, did things like take selfies near the water by myself. I was - like - by myself which he wouldn't let me do the whole time. So, it was weird.

When Ms. Barbounis returned home, she told her husband and her mother what transpired while she was in Israel. She said that her mother chided her, telling her that she knew something would happen if she went away with her boss, telling her, "That's how men are." Her husband had a similar response, telling Ms. Barbounis that she was a princess and Mr. Roman was Shrek and she should have expected such behavior. Ms. Barbounis told her husband that she did not believe that the interactions with Mr. Roman should have occurred and that it "wasn't cool."

According to Ms. Barbounis, after two or three days back in the office, Mr. Roman began berating her for trivial acts, such as using the bathroom too often and taking personal phone calls at work. She said that she did not stand up to him, remarking:

I knew that - like - Gregg is this mean retaliatory person. I've seen him be that way with - like - all the other staff, right. I'm not crossing Gregg. Like, no way, especially not with Marnie 'cause Marnie's his little henchman. She would tell him - like - how many times I went to the bathroom.

Ms. Barbounis did inform Matthew Bennett and Patricia McNulty about her experiences in Israel. Mr. Bennett encouraged her to report Mr. Roman's conduct because of his past interactions with former MEF employees, Leah and Tiffany. According to Ms. Barbounis, Tiffany left the MEF before Ms. Barbounis started there. She said that Tiffany filed a sexual harassment charge against Mr. Roman and was fired. Ms. Barbounis recounted that Mr. Roman had spoken of firing Tiffany and others because "they're lefties." She continued:

I chalked it up to that. I was - like - anybody who participates in the women's march, yeah, they'd love to bring down a conservative organization. I bought into that. I was like anybody wearing - like - the pussy hats, of course they would do that. That's really what I believed.

Mr. Bennett felt strongly that Ms. Barbounis should report Mr. Roman, telling her that the MEF was "Daniel's baby," and he would not want Mr. Roman's behavior to be kept secret. Ms. Barbounis refused, asserting:

I was like, no way are you pulling me into any of that. I was - like - he didn't - like- grab my boob, you know. I mean yeah, he made me feel scared and completely uncomfortable

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and now he's being weird because I didn't - like – acquiesce to him. He definitely asked me for a blow job. Like, not outright but - like - he was getting real close to me. Standing up all chest out. And - like - it was awful. It was - like - a terrible experience and it really bothered me.

We talked about this several times. I sat on the floor in Matt's office? and talked to him about it.

Ms. Barbounis stated that Mr. Roman continued to demean her at work:

It was day in and day out. It was either he was being mean to me and railroading me or he was like, hitting on me in this weird way and it was always continuous... He just started beating me down about work. And when I say beating me down, I mean, like, intentionally trying to mess with me...

Gregg would still be creepy with me. He would still be triggering me. He would - like - make me like sit next to him real close like for dictation purposes. He would – like – say that he had to at these [documents] more clearly and bend me over the computer. He'd be - like – on the computer [and say], "Come look at this." He would - like - look me up and down all the time. He was – like - a creep. He would talk down to me as if I was less than him. He would - like - yell at me. He was a nightmare when he was in the office.

Ms. Barbounis stated that Mr. Roman said things to her such as, "Oh, you're looking good today, Lisa" and "Great skirt."

Ms. Barbounis reported that she responded to Mr. Roman's actions by attempting to prove how smart and competent she was. She described an incident that showed to her Mr. Roman's general disdain for women:

He brought his mom at one time right, and his mom, she's like 90, and she asked - like - do any of you guys speak Arabic? And he goes, "No mom, they're just the academic support staff." Like we were nothing – right - like all the women in there were nothing - were just the support staff.

I wanted to prove that like my work was just as good. So, I would ask for extra work. Some extra policy work 'cause I worked on Capitol Hill. So, I could prove myself. So, I could write more, write articles... I just kept trying hardest to prove that I was worthy.

Ms. Barbounis worked late hours from home. She reported that Mr. Roman called her with work-related requests late at night. According Ms. Barbounis, if she did not respond to Mr. Roman's directives, the following day, he would be "more aggressive and retaliatory" towards her. She remarked:

I was afraid not to answer his phone calls – like – honestly, he was just a terrorist of a freaking person.

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In the summer, Mr. Roman's wife spent two months in Israel. During this time, Mr. Roman would call Ms. Barbounis on days that he was working from home and ask her to come to his house to complete work. She said that although she agreed verbally, she did not follow through. When this occurred, Mr. Roman would "be mean to [her] at work for not going."

Ms. Barbounis attempted to be friends with Mr. Roman and to make him feel that she was on his side. To this end, she invited him out for social events, such as to happy hours. Ms. Barbounis wanted Mr. Roman to feel included because she felt that Mr. Roman "always felt like he was left out." She continued:

But he was always left out because he's a creep... I'm telling you, it is a cesspool of masculine superiority. As a conservative woman who did not believe in that shit at all.

Mr. Roman called out Ms. Barbounis for issues such as not completing assignments that had been left undone for years. She asserted:

They were trying to put stuff in writing to set me up to get me fired even though they knew that – like - when I called them on it every time, it's all in writing and they wouldn't respond.

Ms. Barbounis expected that when she effectively supported her position when she was unfairly admonished, her superiors would respond. While this did not occur, no negative work-performance comments were ever placed in her employment file. Even as Ms. Barbounis felt that Mr. Roman was unjustly criticizing her work, she said that he continued to make statements to her such as, "You know you're still my work wife" and "You know, you're the closest to me here of anybody." She commented:

Day in and day out it was either he was being mean to me and railroading me or he was like hitting on me in this like weird way.

Ms. Barbounis was asked if Mr. Roman ever sent her an inappropriate email, text message, or other missive. Mr. Roman did not, although she considered his demands that she stay at work late inappropriate. Ms. Barbounis also denied that Mr. Roman made an explicit sexual remark to her, nor did he may any comments that were similar to his statements when she was in Israel with him.

Ms. Barbounis said that, over time, the nature of her work changed. She had far fewer substantive responsibilities and was increasingly asked to perform the duties of an administrative assistant. Ms. Barbounis said she was "chomping at the bit" for more responsibility at work. Therefore, she was enthusiastic when a donor provided \$20,000 to the MEF with the directive that the organization call attention to the story of a U.K. journalist, Tommy Robinson, who was jailed for reporting on Muslims and rape.

Mr. Roman gave the assignment to Ms. Barbounis who did some Facebook research and discovered that a "kid," Danny Thomas, organized a large demonstration to be held in England in June. The Middle East Forum approved Ms. Barbounis' request to attend the demonstration but refused to pay for the cost of the trip. Ms. Barbounis enlisted Patricia McNulty as a companion

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traveler and the MEF agreed to pay for half of the cost of their flights. Ms. Barbounis arranged for Rahim and “a bunch of big speakers, like Kurt Welders” to speak at the event. Ms. Barbounis was exhilarated to attend the demonstration outside of 10 Downing Street, which drew a crowd of 25,000. Photographs of Middle East Forum employees were featured in the foreign newspaper. Ms. Barbounis wrote a speech to be delivered at the event by Congressman Gosar and she was successful in her organizational efforts for subsequent demonstrations.

Ms. Barbounis noted that CNN featured her in an article. She believed that her noteworthy work in England engendered jealousy in Mr. Roman and recounted:

Gregg was like, “Oh, it's funny that like my assistant is on CNN. I haven't even met this guy [Tommy Robinson] yet.” So Gregg is seeing that I'm - like - getting good at this and there's some media attention... And we were also getting small dollar donations in because people have found out that we were helping Tommy. They wanted to help Tommy... They would donate funds to us... so [publicity] would be huge. Like, we would be running the website and it would be our biggest hit. Like, the thing that got viewed the most was - like - the Tommy Robinson case...

So, I was good at it. And Gregg's like, “Oh, if you're so into this Tommy stuff you're going to neglect - like - making my meetings.” So, he started like putting me down again. Putting these more menial tasks at me.

A second demonstration for the cause spearheaded by Tommy Robinson was planned for July 2018. Ms. Barbounis was not permitted to attend. She did, however, attend the third demonstration in October 2018. Ms. Barbounis described her emotionally vulnerable state prior to attending this event, noting that she felt “beat down” at work, and experienced “a lot of stress in general” at home. She elaborated:

I mean we have two little kids and I mean - like - I'm married but it wasn't like we were affectionate or sleeping together all the time. We get tired and we've got kids that would come to bed. We don't go out to dinner as much anymore, whatever. I feel bad about myself about work just because - I don't know. For the first time in my life again, I felt like I was like that 16-year-old girl, or like nothing I do is good enough.

Ms. Barbounis traveled to England hoping to meet Tommy Robinson, who was getting released from jail. She paid her own way, and was accompanied by her mother. Ms. Barbounis was able to “hang out” with Mr. Robinson and “his crew.” Danny Thomas was also part of the coterie of individuals celebrating Mr. Robinson’s release. Ms. Barbounis, her mother, and the larger group attended a dinner. Ms. Barbounis described her experience:

Everybody was - like - fawning all over me. It was like I was the American shiny new thing and they were like, “She’s amazing! She did all this stuff. She got us this press.” I got Tommy on Tucker Carlson. They were - like - worshipping me and it felt amazing.

Ms. Barbounis mentioned that Mr. Thomas was flirtatious during dinner. Afterwards, Ms. Barbounis’ mother returned to the hotel and Ms. Barbounis went out for drinks “with everyone.”

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Mr. Robinson became drunk and was put in a cab, while Ms. Barbounis stayed out with Mr. Thomas. She recounted:

I have never done anything like that to my husband or cheated on my husband or anything. Danny is telling me ... "You're the most beautiful girl I've ever seen. You're the smartest girl I've ever seen." and "Oh you're perfect." So, we were walking around St Paul's Cathedral and he grabbed my hand and he kissed me... It was – like – honestly magical.

Ms. Barbounis said that she told her mother what occurred with Mr. Thomas, and when she returned to the U.S., she tearfully confessed her actions to her husband. Ms. Barbounis reported that she told her husband, "We need to fix something because something in me made me do that and I don't want to be the bad one." Mr. Barbounis was understanding, telling his wife that her work "sucked," she was studying to get her master's degree, and had two young children. Mr. Barbounis couched his wife's indiscretion as "an escape." Ms. Barbounis was disappointed in her husband's response:

He didn't say - like - I can't believe you did that. He wasn't angry or disappointed. I guess he was understanding - like really understanding and... I don't understand what led me to spiral or something. But it was like he didn't love me.

Ms. Barbounis recalled that she started to rebel against the tightly structured woman she had been before her October 2018 trip to England. She began to smoke cigarettes and continued to communicate with Mr. Thomas.

In late October/early November 2018, Ms. Barbounis received a call in the MEF office from the elderly man who previously donated \$300,000 for an international conference on ethics and philosophy. They spoke for an hour and Ms. Barbounis apologized for Mr. Roman's reluctance to return his money. Shortly thereafter, Mr. Roman confronted Ms. Barbounis about the conversation. Ms. Barbounis said that she "knew" Ms. Meyers had informed Mr. Roman about the phone call. Ms. Barbounis was upset because she "[had] the best intentions for [the MEF]" and yelled, "This is the most dysfunctional place I've ever worked."

Ms. Barbounis went out for a cigarette and when she returned, Mr. Roman advised Ms. Barbounis to "write-up the whole situation" including the allegation that Ms. Meyers was "spying" on her. Because Ms. Barbounis "is a Libra by nature... and a conflict resolution person," she called Ms. Meyers and asked to meet with her to discuss tensions between them. The following morning, Ms. Barbounis and Ms. Meyers met outside Starbucks. At this meeting, Ms. Barbounis told Ms. Meyers about her interactions with Mr. Roman when they traveled to Israel and her perception of tensions that developed upon their return. In addition, Ms. Barbounis revealed that Mr. Roman compelled her to complete a formal write up about Ms. Meyers. Ms. Barbounis perceived the meeting to end positively and the pair "hugged it out."

When Ms. Barbounis and Ms. Meyers returned to the office, Ms. Barbounis told Mr. Roman that it would be "smooth sailing" from then on. Mr. Roman then told Ms. Meyers that Ms. Barbounis had written her up. Ms. Barbounis believed that this was a manipulation on Mr. Roman's part. She said that the interaction caused Ms. Meyers to have an epiphany:

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All of a sudden it all clicked in her head, like a freaking light bulb... Everything that had been happening since Israel... I showed her my emails and all that stuff... She knew we were being watched and she knew that Gregg would count the times we go to the bathroom and what times we came in... Bugging the office... So much so that [Marnie Meyers] had her boyfriend at one point come in and search the ceilings for - like - bugs in our office...

So, [Ms. Meyers] handwrote this entire note on a yellow legal pad, five pages long about everything... About bugging the office. About what happened in Israel. About how [Mr. Roman] had been with her in the past and asking her to come up and stay late. The fact that she had to feel the need to say to him like, “No, Gregg. I'm not going to sleep with you” or “No, I'm not going to Israel with you. It's inappropriate.”

The following day, Daniel Pipes came into the office and met briefly with all the MEF staff members. He asked them to tell him about Mr. Roman. Ms. Barbounis told Mr. Pipes about her experience with Mr. Roman in Israel and her perception of his behavior since that time. She also told Mr. Pipes about other issues she had with Mr. Roman. Ms. Barbounis said that she was apprehensive about providing this information to Mr. Pipes, fearing that Mr. Roman would retaliate against her for reporting him.

After Mr. Pipes spoke to all of the MEF employees and reviewed the complaints that had been compiled by Ms. Meyers, he came into Ms. Barbounis' office. She recalled:

He looks me in my face, and he goes, “Listen. [Mr. Roman] is a really brilliant guy and priests have been accused of more and still get to keep their jobs. So, he's not going anywhere because I'll talk to him about his behavior. I've talked to him before about the way he interacts with employees and will deal with that later.

Ms. Barbounis said that after Mr. Pipes left the office, she broke down, “sobbed,” and felt “devastated because nothing was going to change.”

However, after his initial assessment of the situation, Mr. Pipes met with in-house counsel. Subsequently, he convened another staff meeting, at which, initially, Mr. Roman was to be present. Ultimately, Mr. Roman did not attend the meeting and staff were encouraged to air their concerns. Mr. Pipes said that until the MEF found a new director, Mr. Roman would not be allowed in the office and would not supervise any of the employees. As a consequence, Ms. Barbounis was placed in a new role as a “communications person.” She said that she was charged with “website stuff” and “putting articles out” and other media activities.

According to Ms. Barbounis, this change occurred “around January” 2019. However, earlier in this interview, she discussed her activities in December 2018, focusing primarily on her relationship with Mr. Thomas. She recounted:

I couldn't get enough [of Mr. Thomas] because he made me feel good about myself – like, really good about myself. And so, December comes, I go to England for something else... I ask Daniel and Gregg if I could work with Tommy [Robinson] on my own time... [They said] “We don't care what you do on your own time.” ... So, I went over there, and I helped

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[Mr. Thomas and Mr. Robinson] do stuff and it was cool and interesting. I was meeting with - like - leaders of political parties over there and throwing this big Brexit demonstration. It wound up that the Guardian picked it up and said -like – “Lisa Reynolds from the Middle East Forum is...”

When staff at the MEF read this Guardian article, someone from the MEF called Ms. Barbounis. She was instructed to make it clear to the Guardian that she was on vacation with her family, and not acting in the capacity of a representative of the MEF.

Ms. Barbounis continued her romantic involvement with Mr. Thomas when she was in England. She said that she learned that Mr. Thomas had lied to her; he had not ended his relationship with his long-term girlfriend, as he had previously said. Ms. Barbounis noted that Mr. Thomas had three children with this woman, whom she described as “bipolar.” According to Ms. Barbounis, Mr. Thomas’ girlfriend, Jazz, began to call and harass her. She provided a complicated narrative of her chaotic interactions with Jazz:

She is crazy. She would – like - make a fake Instagram account and a fake Twitter and a fake Facebook and – like - contact me. And then – like - I would block her and she would do it again. She emailed my husband on Facebook and it's – like – “Your wife is sleeping with Danny Thomas.” And he was – like – “I know exactly what Lisa’s story is. She tells me. She’s a great mother. Leave me alone.” and he blocked her.

Ms. Barbounis denied that she ever had a face-to-face confrontation with Jazz, but reported, “We had a couple verbal phone call things.” According to Ms. Barbounis, Jazz called her a slut and accused her of chasing Mr. Thomas “around town and promising him the moon and the stars.” Ms. Barbounis continued:

She said that I – like - made it easy for him. I served him up on a silver platter and I was just his meal ticket for money. Okay, I don't have anything to give to anybody. I make freaking hardly anything. I was making \$67,000 a year with two kids in full time daycare.

However, Ms. Barbounis did say that she lent Mr. Thomas money before Christmas 2018. Although Mr. Thomas promised to repay her, Ms. Barbounis never received her money back. She reported that she sent Jazz the text message exchange concerning the loan. Ms. Barbounis also sent Jazz the entirety of her text communications with Mr. Thomas and told Jazz that it was Mr. Thomas who was the pursuer in the relationship. She continued to tell Jazz:

I fell for him, don't get me wrong. I fell for him because of where I was in my life. But this is the truth. Here's all of it. And then she was nice to me. She was - like – “You are the only person that ever – like - was nice to me in my life,” and like, “You told me the truth. All these other hoes would say that – like - I was crazy and whatever.” And I was like, “you deserve to know the truth... I'd wanna know.” ... All the truth was there in black and white for her to read. [She could] listen to his voice memos...

I was like, “Look Jazz, the reason that you're stuck in this is because you don't work. You don't have anything going for you. I'll help you - like - there are programs out there. You

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can go to school. You can go graduate from high school. You can go back. You can do this kind of thing. You could do that kind of thing.” And I would be really nice to her, really nice and strong. And then she would turn on me out of nowhere. She’d be - like - screaming at me and like saying crazy things like, “You ruined my life!” and I’m like, “I can’t take this anymore.” So, then I would block her.

Anyway, that went on for like a while. But I always had this – like - soft spot for this stupid girl 'cause I felt guilty...

But this is important for you to know, because I’ll tell you what... In one of our depositions there’s just - like - clips of me saying like these terrible things to her and they were terrible things I said to her. I’m not gonna lie about them. I said them. She’s harassing us on a trip with my mom...

Ms. Barbounis said that she met her mother in Palm Springs. She reported that Jazz called her repeatedly and was “harassing” her. Ms. Barbounis lost patience and recalled:

I was just trying to hurt her as much as possible so she would leave me alone. So, I said mean things.

According to Ms. Barbounis, the clip that was played at the deposition was slanted because the context was absent. She reported that she learned last year that Jazz, referring to Mr. Thomas as her husband, had also called Mr. Roman and Mr. Pipes, informing them that Ms. Barbounis was sleeping with Mr. Thomas. Ms. Barbounis took exception asserting, “they weren’t even married.” She also was concerned about the manner by which Jazz obtained information about her employers.

Ms. Barbounis also discussed her tumultuous relationship with Mr. Thomas, which culminated in a December 2018 trip to Brussels. Ms. Barbounis said that one night in Brussels she attended a dinner to which Mr. Thomas was not invited. After the event, Ms. Barbounis, Mr. Thomas and “all these people” went out for drinks. She reported that Mr. Thomas was “being really insecure” and “had to prove something.” Ms. Barbounis recalled that Mr. Thomas engaged in a heated political argument with someone in the group. Ms. Barbounis thought that Mr. Thomas’ argument was “clearly wrong” and told him to “chill out a little bit.” At the end of the evening, Ms. Barbounis and Mr. Thomas returned to their hotel and began to have sex. She provided the following narrative:

He’s like on top of me and starts like smacking me in my face - like rough sex. Okay, fine, but it got so bad that I couldn’t see. I was telling him to stop. Anyway, it turns out he hit me so hard in my face, he chipped my tooth and he gave me a black eye... I could not see at all and he passed out. And I’m like, “Danny” and I’m like crying. I can’t see, so I’m feeling around the apartment for clothes. I put on a sweater... I feel my way down the hallway, downstairs to like the lobby...

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I had - like - this traumatic experience. I wound up in the ER for nine hours in Brussels. Nobody helped me. I couldn't see anything. The ocular place didn't open until the morning.... I had to get a CAT scan to see if my face was fractured, it was that bad...

So, the next day, I call [Mr. Thomas] ... I'm like "You gotta come get me, I can't get home." I had an eye patch on...

Ms. Barbounis said that she had a corneal tear as well as a chipped tooth and black eye. When asked why she reached out to the man who caused her injuries to come retrieve her, Ms. Barbounis replied:

I wasn't scared of him. I had nobody else. Everybody else was from the panel. I had missed going to the thing that we were supposed to go to the next day because I couldn't go with the black eye. I just told them that I wasn't feeling well...

I'm in foreign land. I'm supposed to be going to Amsterdam in a couple of days with my friend who's flying in.

Ms. Barbounis said that she spent two days convalescing in an apartment with Mr. Thomas. She reported that she could not do anything, and noted that Mr. Thomas had to carry her, bathe her, and finally put her on a train to Amsterdam. Ms. Barbounis met up with her friend and "tried to make the best of the rest of [her] trip."

Following the brutal interaction with Mr. Thomas, Ms. Barbounis said that she had some "correspondence back and forth" with him. However, she reported that she was "like done done" with the relationship. She related:

I still had contact with him here and there through March because I helped Tommy [Robinson] with the campaign in March... But - like - the last time I saw him in March, I didn't kiss him or touch him or anything. As a matter of fact, he was rude to me the entire time and I wasn't particularly nice to him either.

Asked what her husband thought about her European trip, Ms. Barbounis said that he knew that she would be seeing Mr. Thomas, asserting, "the one thing I don't do is lie. I think that lying is like wrong - like inherently wrong. I couldn't come home every day and look my husband in the face..." She continued:

Plus, deep down, I wanted him [Mr. Barbounis] to care. I wanted him to say, "Stop doing this; I love you." I want him to fight for me a little bit. So, I told him. He knew the whole time. He's like, "You're going through a phase now."

At some point after Ms. Barbounis returned to the U.S., the above described personnel changes to the MEF were implemented by Mr. Pipes. Ms. Barbounis said that in her communications role, she improved relations with journalists and increased the number of MEF articles that were published.

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Although she was competent in her new position, Ms. Barbounis continued to think of herself as a policy writer. Despite the fact that public policy was the focus of her academic study, Ms. Barbounis elected to take the spring semester off from her graduate program, noting that she had not finished the finals from the previous semester. Ms. Barbounis recalled that in the fall of 2018, she felt like she was “losing [her] mind,” and went to her primary care physician, who prescribed Zolof.

Ms. Barbounis said that when Mr. Roman was off site, he continued to be involved in projects and team calls. While Mr. Pipes interviewed candidates for the director position, no one was hired. Adding to the disarray at the MEF, Matt Bennett, the Director of Development, quit. Ms. Barbounis said that Mr. Pipes was acting as de facto Director, a position to which she felt that he was ill suited, asserting:

Daniel is not an administrator. He's a thinker. He's a brilliant academic mind. He's a thinker, and so to have him trying to do his academic goals, fund raising, overseas fund raising - like - the administrative part of fund raising, proofreading all the emails that go back and forth and the invitations and the meetings and all that - like - it was too much on him.

Because Ms. Barbounis believed that Mr. Roman “learned his lesson... realized that he’s – like- a jerk or whatever,” she encouraged Mr. Pipes to bring Mr. Roman back into the office. She elaborated on her rationale:

If we are the ones that bring him back, then he can't hate us because we got his job back, right? And he'll be nice to us and everything will be fine, right? And we'll go back to the status quo. He won't be a crazy person... It was my idea, stupidly, to bring him back. I got Trish on board. I'm like, “Come on, bring him back... Bring the freaking dude back and we'll have a peaceful freaking life.”

Ms. Barbounis pitched her idea to Mr. Pipes who, in turn, had a meeting that included Mr. Roman, Ms. Barbounis and others. She related:

Gregg said that his behavior was due to his being a social junkie. He said, “I didn't realize that I was making Lisa feel sexually uncomfortable, it's really because I'm just a social junkie and I want everybody to be my friend.” I said, “Dang - like - that's an unacceptable response...”

Nevertheless, Ms. Barbounis was “on board” with Mr. Roman’s return to the office. According to Ms. Barbounis, Mr. Roman was on good behavior for “a week or two” until she sat across from him at a radio show that she was producing. Mr. Roman referred to the Turks or the Kurds as usurpers, stating, “Once usurpers, always usurpers and they need to be taken out.” Ms. Barbounis believed this to be a veiled threat to her, as Mr. Bennett had previously told her that Mr. Roman referred to her as a usurper. Following this event, Ms. Barbounis perceived Mr. Roman to be “even more manipulative.” She asserted:

[Mr. Roman] would say one thing to us and say something different to Daniel and – like - manipulate everybody... [He would] make everybody fight. Everybody was fine [and] all

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of a sudden, he's unhappy with Trish's work and he's unhappy with my work and he's unhappy with this... his retaliatoriness is getting worse in the office and everybody is like on high alert. Gregg was still not allowed in the office unless he's - like - invited and nobody wants to be around him... He's giving orders that are - like - unattainable... It was just-like - chaos.

Ms. Barbounis accused Mr. Roman of encouraging her initiatives only to "spin it" to Mr. Pipes "in a negative way." She reported that she was "undermined in a million different ways." Ms. Barbounis described Mr. Roman as "relentless. He won't take no for an answer and he pushes his way through." She continued:

He has made great strides for the Middle East Forum. Like publicly, he's brilliant... But he's a master manipulator predator human, that's what he is. And it comes out in every single aspect of his life. It's exhausting. So, I should have just quit my job and gone on my merry freaking way and - like - put it behind me... I thought I was doing the right thing and now I'm stuck and I got this stupid crazy legal battle that I don't really want to be in the middle of right now. I got freaking 20 pages of fake crap about me that anybody who knows me for 2 seconds of my life would know that none of it is true... The next time I go to get another job, they will Google my name and see Lisa Reynolds or Lisa Barbounis and see all this crap they said about me. And who's going to want that? They'll say, "No, that's a headache. That could hurt me in a in a political campaign." [Mr. Roman] is trying to ruin me.

Ms. Barbounis said that Ms. McNulty went to Mr. Pipes to complain about Mr. Roman's "inappropriate behavior," as she had been instructed. Mr. Pipes reportedly responded to Ms. McNulty's email by saying that he had discussed the complaint with Mr. Roman, who denied events as outlined by Ms. McNulty. As a consequence, Ms. McNulty sought legal representation. Ms. Barbounis said that Ms. McNulty enjoined her to participate in the lawsuit against the MEF and Mr. Roman. Ms. Barbounis said that she refused, asserting:

I'm like, dude, I do not want to get into freaking litigation with this shit because it's - like - [Ms. McNulty] doesn't care about politics. She's never going to be in politics again. She was Development Director. She was an event planner. She is doing that now in New York - like - it's basically completely different or whatever she's doing, it has nothing to do with politics. But it's my reputation that's on the line. I can't be the [#] metoo person. Even if it did happen, even if it's true, which it is, I can't be that person. But then I start getting that guilty freaking feeling, like he's never going to stop, and if I leave, he's going to do to Katrina and Delaney - they're young, they're 23 years old. When is Gregg gonna - like - be responsible for his actions? He's always going to act like this. So, I said fine.

Ms. Barbounis talked at length about her perception that evidence presented at a deposition was "manufactured." She also discussed recordings that she possessed of Mr. Thomas speaking to Mr. Roman. According to Ms. Barbounis, Mr. Roman is paying Mr. Thomas to testify against her. She continued:

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I'm afraid Gregg is crazy, and I know that I may sound crazy for saying this, but I'm as equally afraid to lose this lawsuit as I am to win it because he will not stop at anything. He's flying over to England to pay people to testify against me just to win. And you know what's going to happen? Even if I did win this case, I'm afraid he'll come after me physically. He's trying to threaten my job. What he did was awful. He served me papers; he served my husband here at the house... A week later, he served me again to intimidate me at the congressman's office in front of the congressman. Thankfully, I already told the congressman everything... And they put my Chief of Staff on a deposition list. You know why they did that? Because she wouldn't know anything about me and my relationships at the Middle East Forum or Gregg sexually harassing me or any of that. [They did it] to intimidate me, to freaking to hurt me. I mean he's not going to stop and and he's done this to a million women...

CURRENT FUNCTIONING, AS RECOUNTED BY LISA BARBOUNIS

In May or June 2019, Ms. Barbounis began to look for employment outside of the MEF. She said that she applied to 55 local jobs but knew it would be difficult to find employment in Philadelphia. A friend in D.C. told Ms. Barbounis about an opening in Congressman Weber's office. She applied, was interviewed and "got hired immediately." Ms. Barbounis quit her position at Middle East Forum and returned to work on The Hill. Although the job was a good fit for her, it required that she relocated to D.C.

Ms. Barbounis said that she works as a Communications Director for Congressman Weber. She described the work as "probably one of the best jobs that I've had." Ms. Barbounis said that she thrives in Congress. She described the staff in the office as "wholesome," noting, "They pray with you and they're good people and they're good humans. There's nobody out to get you." Ms. Barbounis said that her husband has asked her why she does not move to the private sector and make more money. But Ms. Barbounis feels safe in the environment in which she works. She continued:

Now I don't think I'll ever leave them. I'm afraid to ever leave them. I wouldn't because I love them but like... People say I am the toughest girl they know. I *am* the toughest girl, you know. These people have broken me. I'm not saying it just to say it because I would be embarrassed to say that to anybody. These people are horrible human beings and they're never going to stop and they're never going to fucking leave me alone.

Ms. Barbounis described a typical week. She has an apartment in D.C. with an extra bedroom so her children can visit. Ms. Barbounis travels from Philadelphia to D.C. after her children go to bed on Sunday nights. She works from Monday through Friday in D.C. Ms. Barbounis communicates with her children regularly through the week via Facetime. She returns to Philadelphia late Friday night or early Saturday morning. During the weekends, Ms. Barbounis spends as much time with her children as possible. Despite the flexibility that her job offers, Ms. Barbounis feels "spread thin" with many job responsibilities.

Ms. Barbounis said that she has been effective in her new role. She explained:

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I've been good at it. Like, they love me... I built our subscriber list up by 52% already. We went from like 12,000 subscribers to over 25,000 in nine months... I've done really good work for them... They adore me... But what I do is this; I do all the social media posts – like - for the official side on the campaign side. I oversee all the digital strategy and the print strategy for the campaign side and for the official side. Every time [the congressman] has a speech, I write [it]... He doesn't like bullet points; he wants a 45 minute speech written if he has to speak 45 minutes... He likes 100 words a minute. So I write every press release, every newsletter, every remarks, every statement. Everything that comes out of that office is written by me. My writing has gotten better over the years but I'm always – like - more of a legal analytical writer and more than - like - a creative one with speeches. It just so happens to be that their last communications director wasn't, I guess, that great... And I know [the congressman's] voice... because we are so politically aligned. It's easy because it's things that I would want to say that he says too. So, it has become a little bit easier and I've been getting better. Though obviously the more you do anything, the better you get at it... I still have a say in the constituent services... Our District Director moved on, and the new director that they want isn't going to be [coming on soon]... so they want me to come [and] do the communications for the campaign and the official side...

Occasionally Ms. Barbounis travels for work. She noted that the week prior to this interview, she was in Texas. Ms. Barbounis stated that her boss is flexible and allows her to work from home if her schedule has required travel. Since COVID-19, Ms. Barbounis has been able to work from home more often and was home for a 30-day stretch at one point. Ms. Barbounis was recently able to “reconnect” with her children over a nine-day span, during which time she was their sole caregiver because her husband travelled to Florida to attend his father's funeral service.

Ms. Barbounis said that her life had improved recently but remarked, “this is not the life that I thought that I was building.” Ms. Barbounis has not finished her Master's degree, noting, “I honestly right now I don't have the bandwidth. I just don't have the mental bandwidth to handle.”

Ms. Barbounis quit smoking one month ago. She described herself as “finally enjoying [her] kids again.” Ms. Barbounis is more engaged with her children presently, stating that she reads books to them and plays games, such as hide and go seek. In addition, Ms. Barbounis is working on improving her relationship with her husband. She reported that Mr. Barbounis was “dating” his assistant. Ms. Barbounis said that she could not be “a hypocrite” and express anger at her husband for his infidelity. Ms. Barbounis said that her husband has told her the extra-marital relationship is over but remarked:

She's his assistant, so... I don't know. The point is that -like - we don't actually want to get divorced, right. Not for us, or for the kids... Things seem so messed up... We both say we don't want to divorce... and so it's like, well let's take it one day at a time and see how it goes. I said, you know what the definition of craziness is when you do something over and over again expecting a different result. So, we need – like – to go to therapy. And Stephanie, my therapist said that she would recommend people. And Vasily was like, “Why? So they can just tell me... like I know what's going on in my life.”

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Ms. Barbounis said that her husband does not believe in therapy and said that they have little time to discuss their marriage. She continued:

It's hard for me to talk about things and it's hard for him. So, he's like an old traditional - like - Greek man. He's like old school and it's hard for him... He doesn't understand - like - my need to work- like - and he always had resented me for being - like - sloppy too. As part of his resentment towards me is that - like - he's Mr. OCD clean, which is great for him... But he would resent that I didn't - like - take clothes and put them in the drawer the right way... So, yeah, he's resentful that he's a man and he has to be organized... I'll do the washing up but I'm not perfect and I make mistakes... I have a temper and I'm not perfect by any stretch of the imagination but I'm trying hard to get us back... and I'm making strides.

Ms. Barbounis stated that a private investigator contacted her husband's assistant to enquire whether Ms. Barbounis had ever threatened her. Ms. Barbounis was tearful as she questioned to what length Mr. Roman would go to ruin her family. She regained her composure and said that she tries to follow her therapist's advice to take one day at a time and focus only on what she can control, including the ways in which she reacts to certain situations.

Asked whether she had spoken to her husband about continuing to work with a woman he had slept with, Ms. Barbounis stated that she asked him to move to D.C. Mr. Barbounis has not agreed to move because he is a man of routine and does not like change. In addition, Mr. Barbounis' real estate contacts are in Philadelphia. Ms. Barbounis felt as though she "[didn't] have a leg to stand on" when she asked her husband to relocate because "[she] ruined [her] old life by doing exactly what [she] loathes other women for doing."

Questioned about her perception of the emotional or psychological impact her experiences with Mr. Roman have had on her, Ms. Barbounis replied that she "used to be" depressed every day. Asked to describe the symptoms of depression, Ms. Barbounis stated that she did not pay attention to her children or her husband and felt "really bad about [her]self." She reflected:

I feel really bad about myself. My parents say they were - like- it was almost like they couldn't see anything behind my eyes. Like I was a shell of myself. Now, I at least - like - go to work and I'm happy to go to work and I like being around my kids. I do - like - I have a good week when I don't talk to my lawyer, you know what I mean. And me and my husband are getting along. And I'll talk to my lawyer for a week and I'm feeling good but - like - I'll get a call and it's like the distress is back and I have to deal with this and that.

Ms. Barbounis said that she awakes at 3 am every morning and cannot fall back to sleep until 5 am. She then wakes up at 7 am. Her sleep is otherwise stable, as is her weight.

In addition to the above issues, Ms. Barbounis said that when she was at MEF, she experienced premature ventricular contractions (PVCs). She noted that she originally developed this condition when she was pregnant with her son. At the time, she did not believe that PVCs were stress related. However, when they returned when she was at the Middle East Forum and she was required her

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to wear a heart monitor, Ms. Barbounis came to view her irregular heart rhythm as “anxiety induced.”

MEDICAL HISTORY, AS RECOUNTED BY LISA BARBOUNIS

Kidney stones
S/p stent
Recurrent UTIs
PVCs/PACs
Appy/tonsillectomy/sinus surgery/2 C-sections.

PSYCHIATRIC HISTORY, AS RECOUNTED BY LISA BARBOUNIS

Ms. Barbounis said that when she was 16/17 years old, she saw a family therapist. At age 21, Ms. Barbounis went to an Eagles game, became drunk, fought with her boyfriend, Bobby, and was psychiatrically hospitalized. At this time, Ms. Barbounis smashed a mirror. She denied that she was suicidal.

Currently, Ms. Barbounis sees two different therapists; one for medication management therapy and one for trauma therapy. The medication management therapist ensures Ms. Barbounis is functioning well on her medications without negative side effects. She described the role of her trauma therapist:

She basically just she tells me that like, you know, “As long as you're not hurting anybody, you're fine.” And I'm like, “Well, no. I don't feel fine...I need to know why I still feel like this...Like why this isn't going away yet.”

Ms. Barbounis said that found a physician in DC to manage her Adderall and Zoloft.

SUBSTANCE USE HISTORY, AS RECOUNTED BY LISA BARBOUNIS

Ms. Barbounis denied substance use.

LEGAL HISTORY, AS RECOUNTED BY LISA BARBOUNIS

Ms. Barbounis denied criminal arrests. She is not involved in any other litigation.

Mr. Roman is counter-suing Ms. Barbounis for stealing a donor list and money, allegations she assertively denies. Ms. Barbounis accused Mr. Roman of manufacturing evidence at a recent deposition. She allegedly has audio evidence of Mr. Roman agreeing to pay Mr. Thomas to testify against her about stealing a donor list in a court of law.

MEDICATION, AS RECOUNTED BY LISA BARBOUNIS

Zoloft 50mg qd.
Adderall 30mg qd

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MENTAL STATUS EXAM

Ms. Barbounis was casually dressed and cooperative with the examination. Her speech was fluid but pressured. Ms. Barbounis spoke without interruption for long periods. Most of Ms. Barbounis' narrative was goal directed, but she was occasionally tangential and circumstantial.

Ms. Barbounis presented with an emotionally labile affect. She began to cry within the first five minutes of the interview when she was discussing her mother. Ms. Barbounis' mood was appropriate to content and generally euthymic. She had mild flight of ideas and loosening of association. There was no evidence of delusions, hallucinations, suicidal or homicidal ideation. Her insight was fair and her judgement was not specifically tested due to the nature of the evaluation. Ms. Barbounis' higher integrative functions were grossly intact.

PSYCHIATRIC ASSESSMENT

Rule out bipolar II disorder

Rule out borderline personality disorder

DISCUSSION

Lisa Barbounis is a 38-year-old female who alleges that she was the victim of sexual harassment and abuse, sex discrimination, and a hostile workplace environment when she was employed by the Middle East Forum between September 2017 and September 2019.

In the context of any civil or criminal assessment, it is essential to obtain independent, objective information about all aspects of the events involved and the individual being assessed. An objective evaluation cannot rely solely on an individual's self-report. According to the American Academy of Psychiatry and the Law:¹

Forensic psychiatrists are concerned with the accuracy of the received information that forms the basis for their conclusions. Consequently, in performing assessments, they are particularly concerned about dissimulation and malingering of symptoms and disorders....

It is necessary for forensic evaluators to corroborate information upon which they base their opinions. This is also explicitly stated in the American Psychological Association's Specialty Guidelines for Forensic Psychologists.² The guidelines indicate:

Forensic practitioners ordinarily avoid relying solely on one source of data, and corroborate important data whenever feasible (AERA, APA, & NCME, in press). When relying upon data that have not been corroborated, forensic practitioners seek to make known the uncorroborated status of the data, any associated strengths and limitations, and the reasons for relying upon the data.

While lawyers occasionally argue that an assessment of credibility is outside the purview of a psychiatrist, and only "triers of fact," such as a jury, should be charged with this duty, this position

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ignores fundamental truths about psychiatric diagnoses. Psychotic Disorders, Trauma and Stressor-Related Disorders, Somatic Symptom Disorders, Substance-Related Disorders and Paraphilic Disorders all require an assessment of the reliability of the historian and an assessment of the circumstances that contribute to an individual's Chief Complaint. Because people can lie, have a distorted view of themselves and/or the world, be suffering from a biologic condition that prevents them from accurately distinguishing between illusions and reality and have internal or external motivation to distort the truth, all psychiatric evaluations involve an assessment of reality.

Ms. Barbounis described her first impressions of Gregg Roman:

Greg was so intense, and he was - like - crazy honestly. Right away, from the gate, in my interview. And he grilled me. I was in there for like two hours and he was just - like - asking me questions about, like, escape routes and - like - "If anybody ever comes up here, what's the escape?" And I'm thinking of - like - trying to think of the layout of the thing and where we would go and - like - crazy questions.

Ms. Barbounis also made note of the fact that in her employment interview, Mr. Roman told her that he needed "a work wife."

According to Ms. Barbounis, Mr. Roman demonstrated his intensity to all with whom he interacted. She noted that he "barked orders" to people on conference calls, for example. Further, Ms. Barbounis witnessed his leadership style generally:

Kind of like what they say Trump does... Like pitting people against each other like to see who wins and comes up with the best ideas. Like it's some game or something.

While discussion of the efficacy or appropriateness of Mr. Roman's leadership style is beyond the scope of this report, Ms. Barbounis knew the atmosphere she was entering when she accepted a position at the Middle East Forum. It included relatively loose boundaries, strong personalities, competition, and surveillance.

Ms. Barbounis shares some qualities with Mr. Roman; by her own account, she is an ambitious strong woman and her behaviors demonstrate that there is limited separation between her personal and professional life. When Ms. Barbounis joined the MEF, she embraced the culture there. She believed in their "conservative" mission and viewed herself as a tough woman, remarking:

Like, my thing was - like - if I'm going to play in this big boy arena, I need to put my big girl pants on...

Ms. Barbounis demonstrated her willingness to "play" the male "game," when she upped the ante by offering a personal and salacious rejoinder to a comment that she overheard at the Airbnb during the AIPAC weekend. While someone made a course remark about telling someone to "go suck a dick," Ms. Barbounis made it personal, responding "Unlucky for you guys, you'll never know." Ms. Barbounis even accepted an action that she believed was unethical; when Mr. Roman allegedly told her that he was attempting to get Aman Patel to quit because she was "a walking lawsuit," Ms. Barbounis' response was "Well, that's really messed up, but alright."

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The work of the MEF often involved social events such as fundraisers. Further, employees were encouraged to develop relationships with donors, journalists, activists, and others. This type of work also functioned to blur boundaries between social and employment realms. This was especially true in a small office, as is the case of the MEF. Ms. Barbounis used the informal, flexible atmosphere at the MEF when it suited her, as when she used her position in the organization to get featured in an article in the Guardian, even though she was in England on a personal trip.

The closeness between staff members at the MEF manifested itself in many ways, both good and bad. It allowed for a sense of comradery, as evidenced by the close relationship between Ms. Barbounis and Ms. McNulty. The flip side is that it also generated gossip, factions, and interactions that could be misunderstood. The events cited by Ms. Barbounis as the basis for her lawsuit are emblematic of such interactions.

Ms. Barbounis' Complaint portrays Mr. Roman as scheming to lure her to Israel for the purposes of sexual gratification. Not only does this not conform to the account provided by Ms. Barbounis during my interview of her, it is not supported by Mr. Roman's behavior during that trip. Mr. Roman only asked Ms. Barbounis to accompany him on the trip after Ms. Meyer turned down the offer because she did not believe it was appropriate for a single woman to be staying in an Airbnb with a man. Ms. Barbounis was not coerced into going. Indeed, she was very happy to have the experience; spontaneously discussing that she had limited travel experience and had only been overseas twice in her life. Ms. Barbounis never described herself as compelled to agree to the trip because Mr. Roman "threatened to withhold the business trip and opportunity altogether if Lisa Barbounis did not agree to put herself in a sexually vulnerable position by sharing the space." In fact, Mr. Roman apologized to Ms. Barbounis when the pair arrived at the Airbnb. She recounted:

[Mr. Roman is] like, "Oh, so sorry, this place said it had two bathrooms and it said that it had it was more spacious than this." ...I don't care, whatever, I'll take the furthest bedroom away 'cause I wanted privacy.

Far from attempting to seduce or coerce Ms. Barbounis into a sexual relationship, Mr. Roman spent his time with her going to business events. When Mr. Roman wanted to engage in non-work related activities, he went on his own. While Ms. Barbounis has made much of Mr. Roman's explicit and disinhibited discourse when twice upon his return from his independent forays from the Airbnb, it is essential to note that Ms. Barbounis never said that he ever asked her to engage in sexual activities with him. While it may have been imprudent and vulgar to talk about blowjobs, the need for sexual release, and the physical attributes of women, at no time did Mr. Roman direct the conversation to Ms. Barbounis' physical attributes nor did he express a desire for her. Further, while Ms. Barbounis has repeatedly described Mr. Roman's physical strength and size, never does she report that he even touched her casually, let alone coercively.

The text message excerpts contained in the Complaint reference Ms. Barbounis' feelings of discomfort. "He's creepy. Talking about stuff he shouldn't be and too drunk." "The shit he is saying is so strange I can't type it all anyway." Nowhere does Ms. Barbounis suggest that Mr. Roman's sexual interest was for her. A drunk, disinhibited man would not be expected to attempt to "coerce Lisa Barbounis into engaging in sexual acts with him." Given Ms. Barbounis' detailed

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and graphic descriptions of Mr. Roman's domineering, overly candid way of speaking, it is impossible to believe that he would fail to be direct in propositioning Ms. Barbounis, had he interest in having sex with her, especially with the social lubrication of alcohol. To the contrary, Mr. Roman appears to be speaking to Ms. Barbounis as a sister, a confidante to whom he can openly discuss his romantic disappointments and desires. As disquieting as this may be, it is a far cry from sexual assault or sexual harassment.

The only physical contact that occurred between Ms. Barbounis and Mr. Roman happened when he asked her to join him on the balcony of the Airbnb. Mr. Roman was smoking a cigarette and pointed out the sites of Tel Aviv to Ms. Barbounis. Ms. Barbounis said that Mr. Roman came and lay on the couch where she was sitting and put his foot under her behind. Ms. Barbounis was not shy about calling him on his behavior; she told him to stop and admonished him for being "weird." Far from taking this physical contact as a means by which to facilitate a sexual encounter, Mr. Roman responded, "Oh, you know you're my work wife. You know, it's me, you, and the universe. You're going to be my right-hand man. You're going to be my Huma Abedin." These images are entirely inconsistent with a view that Mr. Roman wanted Ms. Barbounis to be his mistress.

Although Ms. Barbounis asserted that putting a knife under her pillow is evidence that she was afraid that Mr. Roman would sexually assault her, this is not persuasive. Mr. Roman had not given Ms. Barbounis reason to fear for her safety beyond the fact that he was intoxicated and voluble about his sex life. Mr. Roman had not threatened Ms. Barbounis by word or deed. In fact, Ms. Barbounis did not describe any portion of the narrative that was directed towards her specifically, beyond Mr. Roman's desire that she agree with his premise that he "deserved" a "hot wife" and a blowjob. Had Ms. Barbounis been truly frightened for her safety, she could have left the Airbnb and gone to a hotel.

Given the explicit nature of Mr. Roman's communications to Ms. Barbounis about his sex life, it is puzzling why Ms. Barbounis believes that he would be coy when trying to "coerce" or "lure" her into engaging in sexual activity with him. Ms. Barbounis' complaints about Mr. Roman's behavior when she returned from Israel consist of having her sit close to him for dictation purposes or having to look at information on his computer. Mr. Roman's statements to Ms. Barbounis were equally subdued; she said that he told her that she looked good or made a comment, "Great skirt." A man who could discuss blowjobs with impunity, would be unlikely to be so tame if he was sexually preying on Ms. Barbounis.

The impact that Ms. Barbounis' poor ego-strength has on her complaints cannot be overstated. During the course of this interview, Ms. Barbounis repeatedly and tearfully described the emotional pain she experienced as a result of feeling unable to live up to her parents' expectations. Even though Ms. Barbounis is well aware of the emotional vulnerabilities that she carries as a result of her childhood, she has not resolved them. This was most strikingly articulated when Ms. Barbounis discussed her response to her father even after she had graduated from an Ivy League school and proved her professional merit:

I remember I was working for a congressman and I wrote a speech and [Mr. Reynolds] goes, "Man it's so disappointing they don't write their own speeches and they got like, you

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know, Lisa Reynolds over here, Joe nobody writing their speech.” Like, that’s how my dad talks, you know, and I’m like, “I’m not Joe nobody, I’m smart, you know.”

Ms. Barbounis’ need to repeatedly and compulsively seek external affirmation of her worth is the thread that runs through both her personal and professional lives. Ms. Barbounis feels valued only when the accolades she receives are immoderate and constant. This is evident in virtually every enterprise in which she engages as noted by the following examples:

Of her experience at the University of Pennsylvania, Ms. Barbounis said:

I’m coming from Community College and [her peers at Penn] weren’t, and it was – like - an eye-opening experience to me. They would come to me and say, “I need help with my French homework” or, you know, “Can you help with this decision tree” or, you know, “What do you think about Hobbes’s theory?” And I’m - like - Oh my God they actually think I’m smart. **It was weird for me but it felt really, really good... Even Vasili would tell you – like - he saw a change in my self-esteem, how I carry myself. It was just... the best thing that ever happened to me. Hands down.** (emphasis added)

Of her experience working for Congressman Costello, Ms. Barbounis said:

I mean still to this day people are emailing me from the same address. “Please help me. Please help my friends - like - Please help us, please help us.” **I have boxes of thank you cards and so it was again that – like - affirmation that I was good and worthy.** (emphasis added)

Of her experience with Tommy Robinson’s cause, Mr. Barbounis said:

Everybody was - like - fawning all over me. It was like I was the American shiny new thing and they were like, “She’s amazing! She did all this stuff. She got us this press.” I got Tommy on Tucker Carlson. **They were - like - worshipping me and it felt amazing.** (emphasis added)

Of her experience new employment, Ms. Barbounis said:

I’ve been good at it. Like, they love me... I built our subscriber list up by 52% already. We went from like 12,000 subscribers to over 25,000 in nine months... I’ve done really good work for them... **They adore me...** (emphasis added)

In contrast, Ms. Barbounis perceived that she experienced less enthusiastic reviews of her work at the MEF. Ms. Barbounis provided the following account of Mr. Roman’s reaction when she was featured in a CNN article:

Greg was like, “Oh, it’s funny that like my assistant is on CNN. I haven’t even met this guy [Tommy Robinson] yet.” So Greg is seeing that I’m - like - getting good at this and there’s some media attention...

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So, I was good at it. And Greg's like, "Oh, if you're so into this Tommy stuff you're going to neglect – like - making my meetings." So, he started like putting me down again. Putting these more menial tasks at me.

Riding high from the exorbitant praise she received from Mr. Robinson, Mr. Thomas and others in the U.K., Ms. Barbounis perceived any necessary but unglamorous task as "menial." Unable to tolerate the fact that she was not celebrated by Mr. Roman, Ms. Barbounis worked to get him exiled. Ms. Barbounis then sought to exploit her position of power by consolidating it:

If we are the ones that bring him back, then he can't hate us because we got his job back, right? And he'll be nice to us and everything will be fine, right? ... It was my idea, stupidly, to bring him back.

The above described dynamic of requiring extraordinary affirmation and feeling aggrieved when she does not receive it is also evident in Ms. Barbounis' personal relationships. Ms. Barbounis discussed her first romantic interaction with Mr. Thomas:

Danny is telling me ... "You're the most beautiful girl I've ever seen. You're the smartest girl I've ever seen." and "Oh you're perfect." So, we were walking around St Paul's Cathedral and he grabbed my hand and he kissed me... **It was – like – honestly magical.** (emphasis added)

Just as Ms. Barbounis subconsciously hoped that her success in England would transfer to her job in Philadelphia, Ms. Barbounis lay her infidelity at her husband's feet, hoping for a dramatic proclamation to validate her self-worth. Her comments below are telling:

[Vasily Barbounis] didn't say - like - I can't believe you did that. He wasn't angry or disappointed. I guess he was understanding - like really understanding and... I don't understand what led me to spiral or something. **But it was like he didn't love me.** (emphasis added)

The parallels between Ms. Barbounis' personal and professional lives continued. When Mr. Barbounis did not respond as his wife needed, she persisted in undermining their relationship by continuing her affair with Mr. Thomas:

I couldn't get enough [of Mr. Thomas] because he **made me feel good about myself – like, really good about myself.**(emphasis added)

The same pattern of idealization and devaluation is evident in Ms. Barbounis' discussion of Jazz. She attempts to be Jazz's mentor and savior and when this is rebuffed, Ms. Barbounis goes out of her way to be destructive:

I was just trying to hurt her as much as possible so she would leave me alone. So, I said mean things.

Evaluation of Lisa Barbounis

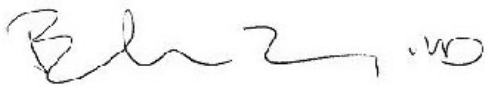
Ms. Barbounis does not appear to fully believe her own account of being sexually harassed and assaulted by Mr. Roman. She did not say that Mr. Roman was sexual or aggressive with her when she communicated with Ms. McNulty from Israel. Rather, Ms. Barbounis described Mr. Roman merely as “weird” and “creepy” in her text messages. Further, Ms. Barbounis said that she did not want to report Mr. Roman’s behavior to Mr. Pipes because he did not “outright” ask her for a blowjob or physically touch her. While Mr. Roman’s behaviors may have been out of conventional bounds, Ms. Barbounis’ language and behavior was similarly unorthodox. From her unseemly affair with Mr. Thomas to the gossipy email exchanges with her co-workers, Ms. Barbounis appears to embrace a double standard regarding acceptable behavior.

Ms. Barbounis’ life currently is little changed from her life when she was working at MEF. She has a job that she loves, is attempting to spend more quality time with her children and wants to repair her strained marriage. Although Ms. Barbounis has alleged emotional difficulties related to events at the MEF, her overall social, emotional, and occupational functioning is, by and large, the same as it was prior to her employment with the MEF. Review of Ms. Barbounis’ treatment records would be helpful in providing a complete analysis of her psychiatric status.

CONCLUSIONS

1. Lisa Barbounis does not display any psychiatric symptoms that can be attributed to her tenure at the Middle East Forum.
2. Lisa Barbounis has problems related to self-esteem and emotional regulation that are unrelated to and were not exacerbated by events at the Middle East Forum.

These opinions have been rendered with a reasonable degree of medical certainty. I reserve the right to amend this report should I receive additional medical records or information.



Barbara Ziv, M.D.

¹ Glancy, G., Ash, P., Bath, E., Buchanan, A., Fedoroff, P., Frierson, R., . . . Zonana, H. (2015). AAPL Practice Guideline for the Forensic Assessment. *The Journal of the American Academy of Psychiatry and the Law*, 43(2 Suppl), S3-S53.

² <https://www.apa.org/pubs/journals/features/forensic-psychology.pdf>